

Illinois Environmental Protection Agency
Bureau of Air, Permit Section
1021 N. Grand Avenue East
P.O. Box 19506
Springfield, Illinois 62794-9506

Project Summary for an Application from
Rockford Blacktop Construction Company for Renewal of the
Federally Enforceable State Operating Permit (FESOP) for
Asphalt Plants and RAP Plant
Loves Park, Illinois

Site Identification No.: 201803ABE
Application No.: 72110037

Schedule

Public Comment Period Begins: June 7, 2006
Public Comment Period Closes: July 7, 2006

Illinois EPA Contacts

Permit Analyst: Dwayne Booker
Community Relations Coordinator: Brad Frost

I. INTRODUCTION

Rockford Blacktop Construction Company has applied for renewal of its Federally Enforceable State Operating Permit (FESOP) for its Asphalt Plants and RAP Plant located in Loves Park, Illinois. This plant requires an air pollution control operating permit because it is a source of emissions. The Illinois EPA has prepared a draft of the renewed permit that it would propose to issue for the plant. However, before renewing the permit, the Illinois EPA is holding a public comment period to receive comments on this proposed action and the terms and conditions of the draft permit that it would propose to issue.

II. SOURCE DESCRIPTION

Rockford Blacktop Construction Company is an asphalt plant that produces asphalt paving for use on roads, parking lots, driveways. Asphalt paving is composed of aggregate crushed rock which is held together by asphalt. The emission units at this plant that require an operating permit include natural gas fired drum-mix asphalt plant and natural gas fired batch plant equipped with a common baghouse and dryer, 3 Asphalt Storage Tanks (30,000-gallon, each), 3 miscellaneous asphalt storage tanks (6,000-gallon, 2,000-gallon, and 15,000-gallon), a liquid asphalt storage tank (10,000 gallon), one anti-strip additive (2,000 gallon) storage tank, and one RAP processing plant comprised of two crushers, two screens, and three conveyors. These units are sources of emissions because emissions generated from the combustion of fuel in the dryer and the asphalt storage tank heaters are nitrogen (Nox), carbon monoxide (CO), sulfur dioxide (SO₂), and volatile organic material (VOM).

III. GENERAL DISCUSSION

Federally Enforceable State Operating Permits (FESOPs) are federally enforceable, that is, the terms and conditions of the permits can be enforced by USEPA under federal law, as well as by Illinois government and the public under state law. These permits can establish federally enforceable limitations on the operation and emissions of a source that restrict the potential emissions of the source.

The source has been operating this plant under a FESOP because the actual emissions of the plant are below the levels at which the plant would be considered a major source under Title V of the federal Clean Air Act. However, in the absence of federally enforceable limitations, the plant's potential emissions would be such that the plant would be considered a major source. The permit acts to restrict the plant potential emissions so that it need not be considered a major source. As a result, the source does not need to obtain a Clean Air Act Permit Program (CAAPP) permit for the plant, as would otherwise be required.

The FESOP limits the operation and annual emissions of the plant to below the major-source-thresholds of 100 tons for VOM, 10 tons for an individual HAP and 25 tons for combined HAPs.

IV. APPLICABLE EMISSION STANDARDS

All emission units in Illinois must comply with state emission standards adopted by the Illinois Pollution Control Board. These emission standards represent the basic requirements for sources in Illinois. The Board has standards for pollutant emissions

from asphalt plant. The application shows that the plant is in compliance with applicable state (AND FEDERAL) emission standards.

V. CONTENTS OF THE PERMIT

The renewed permit that the Illinois EPA is proposing to issue would continue to identify the specific emission standards that apply to the emission units at the plant. As explained, the natural gas fired drum-mix asphalt plant and natural gas fired batch plant equipped with a common baghouse and dryer, 3 Asphalt Storage Tanks (30,000-gallon, each), 3 miscellaneous asphalt storage tanks (6,000-gallon, 2,000-gallon, and 15,000-gallon), a liquid asphalt storage tanks (10,000 gallon), one anti-strip additive (2,000 gallon) storage tank, and one RAP processing plant comprised of two crushers, two screens, and three conveyors ARE subject to NSPS, which requires appropriate compliance procedures, including inspection practices, recordkeeping requirements, and reporting requirements. The Permittee must carry out these procedures on an on-going basis to demonstrate that the facility is operating within the limitations set by the permit and are properly controlling emissions. The conditions of this permit are intended to ensure that the source continues to comply with applicable emission standards.

The permit would also contain limitations and requirements to assure that this plant is operated as a non-major source. The permit would limit the operation and annual emissions of the plant to below the major-source-thresholds of 100 tons for VOM, 10 tons for an individual HAP and 25 tons for combined HAPs. Annual emissions of other pollutants from the plant are well below the 100 ton major source threshold.

The permit would also set limitations on to assure that this facility will be operated as non-major source. The permit set limitations on single and total HAP emissions. These limitations are consistent with the historical operation of emission units at the plant.

The permit conditions would also continue to require appropriate compliance procedures, including inspection practices as well as recordkeeping and reporting requirements. The source must carry out these procedures on an on-going basis to demonstrate that the plant is being operated within the limitations set by the permit and the plant's emissions are being properly controlled.

VI. REQUEST FOR COMMENTS

It is the Illinois EPA's preliminary determination that the source has met the requirements for renewal of its permit. The Illinois EPA is therefore proposing to renew the permit.

Comments are requested on this proposed action by the Illinois EPA and the proposed conditions on the draft permit. If substantial public interest is shown in this matter, the Illinois EPA will consider holding a public hearing in accordance with 35 IAC Part 166.